

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MELISSA ENG-HATCHER, on behalf of herself and all others similarly situated,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No. 07-CIV-7350 (BSJ) (KNF)
)	
SPRINT NEXTEL CORP., SPRINT/UNITED MANAGEMENT CO., and DOES 1 through 10, inclusive,)	DECLARATION OF ASHLEY R. HURST IN SUPPORT OF DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL <u>DISCOVERY FROM DEFENDANTS</u>
)	
Defendants.)	
)	

I, Ashley R. Hurst, hereby declare and state, under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner with the law firm of Rogers & Hardin LLP, counsel for Defendants Sprint Nextel Corp. and Sprint/United Management Co. in this action, and I have been admitted pro hac vice to practice before this Court. I am personally involved in all aspects of Defendants' defense of this case, including Defendants' participation in discovery. I submit this declaration in support of Defendant's Opposition to Plaintiff's Motion to Compel Discovery from Defendants.
2. Attached hereto as Exhibit A is a true and correct copy of a June 23, 2008 letter from J. Timothy Mc Donald to the Honorable Kevin N. Fox.
3. Attached hereto as Exhibit B is a true and correct copy of Defendants' Objections and Responses to Plaintiff's First Request for Production of Documents, dated May 6, 2008.
4. Attached hereto as Exhibit C is a true and correct copy of a June 20, 2008 letter from Elise M. Bloom to Gerald D. Wells, III, Esq.
5. Attached hereto as Exhibit D is a true and correct copy of a May 19, 2008 letter from

Robert W. Biela to Elise M. Bloom, Esq.

6. Attached hereto as Exhibit E is a true and correct copy of a May 22, 2008 letter from Ashley R. Hurst to Robert W. Biela, Esq.

7. Attached hereto as Exhibit F is a true and correct copy of a June 12, 2008 letter from Gerald D. Wells, III to Ashley R. Hurst, Esq.

8. Attached hereto as Exhibit G is a true and correct copy of a June 16, 2008 letter from Gerald D. Wells, III to Hunter R. Hughes III, Esq., Ashley R. Hurst, Esq., and Kerri A. Gildow, Esq.

9. Attached hereto as Exhibit H is a true and correct copy of a June 18, 2008 letter from Elise M. Bloom to Gerald D. Wells, III, Esq.

10. Attached hereto as Exhibit I is a true and correct copy of an e-mail from Gerald D. Wells, III to Elise M. Bloom dated June 19, 2008 at 4:58 p.m.

11. Attached hereto as Exhibit J is a true and correct copy of a June 19, 2008 letter from Gerald D. Wells, III to Elise M. Bloom, Esq.

12. Attached hereto as Exhibit K is a true and correct copy of an e-mail from Elise M. Bloom to Gerald D. Wells, III dated June 20, 2008 at 5:21 p.m.

13. Attached hereto as Exhibit L is a true and correct copy of a June 30, 2008 letter from J. Timothy Mc Donald to the Honorable Kevin N. Fox.

14. Attached hereto as Exhibit M is a true and correct copy of an e-mail from Gerald D. Wells, III to Elise M. Bloom dated June 23, 2008 at 12:27 p.m.

15. Attached hereto as Exhibit N is a true and correct copy of an e-mail from Elise M. Bloom to Gerald D. Wells, III dated June 23, 2008 at 3:49 p.m.

16. Attached hereto as Exhibit O is a true and correct copy of an e-mail from Gerald D.

Wells, III to Elise M. Bloom dated June 24, 2008 at 5:54 p.m.

17. Attached hereto as Exhibit P is a true and correct copy of a June 23, 2008 letter from J.

Timothy Mc Donald to Gerald D. Wells, III, Esq., Robert W. Biela, Esq. and Nick Williams,
Esq.

18. Attached hereto as Exhibit Q is a true and correct copy of an e-mail from Elise M. Bloom
to Gerald D. Wells, III dated June 24, 2008 at 5:08 p.m.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 21st day of July, 2008, in Atlanta, Georgia.



Ashley R. Hurst